Pfeiffer, Jane K - DNR

From: Robert Reineke <rreineke@ksinghengineering.com>

Sent: Tuesday, April 13, 2021 5:53 PM

To: Pfeiffer, Jane K - DNR **Cc:** Shane LaFave; Pratap Singh

Subject: RE: Community Within the Corridor - East Block (02-41-263675) - Next Immediate Steps

Attachments: Figure 1 - Vapor Intrusion Mitigation Plan.pdf

Follow Up Flag: Follow up Flag Status: Completed

Jane,

Thank you for arranging the meeting. It was very helpful.

For information purposes, I'm providing an interim update to the vapor intrusion mitigation plan which covers all occupiable parts of the building.

In the meantime, we are working on addressing WDNR's questions and comments on an expedited basis. I will reach out with questions for parts I find vague or unclear. We do not expect significant changes to the plan, as I noted the mathematical model based on the PFE test is the basis of design and WDNR did not provide any direct critiques of the mathematical model, but I'll endeavor to make the WDNR as confident as possible with our plan. Ultimately we do have the same goals, prevent TCE vapors from getting into the building, protect indoor air quality, provide a sub-slab depressurization system that's effective for the whole building, and remove TCE and other contaminants from the site ensuring that there are no long term risks. But, we at least need WDNR conceptual approval so that we can move forward to the pilot scale testing and commissioning process so that we prove that the system is working or make adjustments.

Please let us know if there are any questions or comments. Thanks.

Robert T. Reineke, P.E.

Principal Engineer | rreineke@ksinghengineering.com



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From: Pfeiffer, Jane K - DNR

Sent: Tuesday, April 13, 2021 4:06 PM

To: Robert Reineke
Cc: Shane LaFave

Subject: Community Within the Corridor - East Block (02-41-263675) - Next Immediate Steps

Hi Robert,

Thank you for speaking with me today regarding the above-referenced site. In response to our meeting on Friday, April 9, 2021, and in consideration the strict construction schedule established at this site, the DNR is providing this email as a guidance for immediate next steps for the remedial action design and plan for this site. The DNR requests that a detailed written response (document) be provided to sections I.A. and I.B. (Vapor- remedial action and mitigation) and section II

(Soil-remedial action) of the Remedial Action Review segment of Review of Remedial Action Design Report (RADR) DNR letter, dated April 9, 2021 (attached), as detailed below:

- Sections I.A. and I.B.: In consideration with the requirements and comments included in these sections of the April 9, 2021, DNR letter, provide a revised VMS design report to present a much more robust VMS system. The design report must be revised to ensure that the VMS is effective in all areas of the building, which is essential to create protective conditions for the people that will reside in this structure. Additionally, the design report must include a your preliminary commissioning plan (i.e., pilot testing plan). The DNR suggests that you reference Appendix D, Commissioning Guidelines, in RR-800, Addressing Vapor Intrusion at Remediation & Redevelopment Sites in Wisconsin, to assist in your development of a commissioning plan.
- Section II: Considering the degree of TCE contamination identified thus far at this site, the DNR would like to take the time to strongly recommend excavating soils where contaminant concentrations are highest (i.e., "hot spot excavation"), at a minimum, to satisfy Wis. Admin Code § NR 726.05(8)(b), which states that prior to case closure, any site where vapors are present above their respective VRSLs must complete a remedial action to reduce the mass and concentration of volatile organic compounds to the extent practical. The DNR understands that construction at this site is underway and that the opportunity to perform these types of hot spot soil excavations appears to be dependent on the strict construction schedule and, therefore, must be considered and planned for as soon as possible.

This document should be as thorough and detailed as possible. The DNR suggests providing this document in the form of a technical assistance request with its associated fee for DNR review and response, and requests that the desired date for DNR response be clearly indicated in the document. Please note that the DNR may not be able to approve the RAP following the submittal of this requested document. However, with these requested details and updates, the DNR may be able to provide more direct feedback and suggestions on how to better improve the proposed RAP, and more specifically the VMS.

Please note that the requirements outlined in the DNR RADR review letter that are not specified in this email must still be satisfied, when and as applicable. Do not hesitate to reach out with any questions, comments or concerns that you may have.

Thank you,

Jane

We are committed to service excellence.

Visit our survey at http://dnr.wi.gov/customersurvey to evaluate how I did.

Jane Pfeiffer

Phone: (414) 435-8021 jane.pfeiffer@wisconsin.gov

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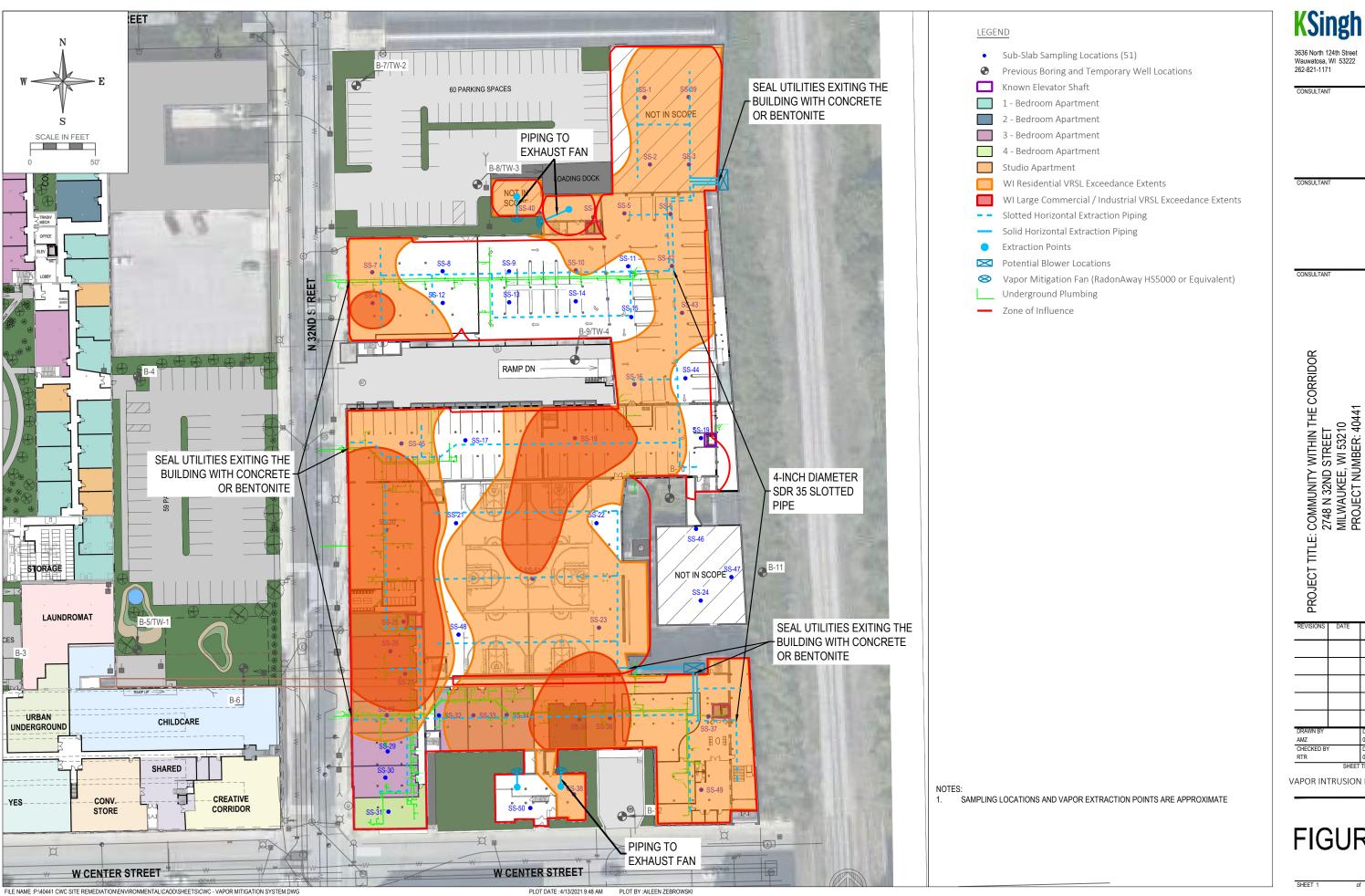
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VAPOR INTRUSION MITIGATION PLAN

FIGURE 1